

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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ARLENE J. DELGADO,

Plaintiff,

No. 19-cv-11764 (AT)

-against-

DONALD J. TRUMP FOR PRESIDENT, INC.,  
TRUMP FOR AMERICA, INC., SEAN SPICER,  
individually, REINCE PRIEBUS, individually, and  
STEPHEN BANNON, individually,

Defendants.

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**NOTICE OF MOTION**

PLEASE TAKE NOTICE that, upon the accompanying Affirmation of Abraham Z. Melamed, Esq. dated April 23, 2021 and exhibits thereto, supported by the points and authorities set forth in the accompanying memorandum of law, and all prior proceedings, Plaintiff Arlene Delgado will move this Court at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York 10007, before the Honorable Analisa Torres, for an Order permanently enjoining Defendants from seeking to enforce a purported “Agreement” signed by Plaintiff, particularly its non-disclosure and non-disparagement provisions, together with such other and further relief as the Court may deem just and proper.

Dated: Los Angeles, California  
April 23, 2021

DEREK SMITH LAW GROUP, PLLC

BY: /s/Abraham Z. Melamed

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